

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

CHRISTOPHER CLOUGH

Criminal Case No. 17-37-JL

U.S. DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

DEC 18 2018

FILED

**UNITED STATES' AMENDED EXHIBIT LIST**

The United States of America, by Scott W. Murray, United States Attorney for the District of New Hampshire, hereby submits the Government's Exhibit List. The Government may use in its case-in-chief the following exhibits:

Ex.	(Id)	Description
100	(d)	Letter from FDA to Insys
101	(d)	Subsys Medication Guide
102	(d)	TIRF REMS Access Program
103	(d)	TIRF REMS Prescriber Enrollment Form
104	(d)	TIRF REMS Patient-Prescriber Agreement Form
105	(d)	Subsys Label
110	(d)	Board of Medicine Proceedings Transcript Excerpt
120	(d)	Email March 28, 2013 Subject: Ride Along
121	(d)	Email April 2, 2013 Subject: Lost Opportunity
122	(d)	Email June 5, 2013 Subject: IMPORTANT – Hartford, Ct Daily REMS Report...
123	(d)	Email August 2, 2013 Subject: Clough/Manchester, NH Territory
124	(d)	Email March 11, 2013 Subject: "it can be done"
130	(d)	Picture of N. Levine and C. Clough
131	(d)	Email July 19, 2013 chain with C. Clough Resume and Speaker Nom Form
132	(d)	C. Clough Speaker Agreement
133	(d)	E-mail August 3, 2013 chain
134	(d)	Email Nov. 14, 2013 from J. Roper to N. Levine, et al.
135	(d)	Email May 6, 2014 from J. Roper to N. Levine, et al.
136	(d)	Letters of Medical Necessity * 136(a) Letters of Necessity - Jeff Kyle *
137	(d)	N. Levine Commissions Chart
138	(d)	Email April 12, 2013 from N. Levine
140	(d)	K. Flynn Sign-in Sheet Library Restaurant January 9, 2014
141	(d)	K. Flynn and A. Carignan Sign-in sheet Abe & Louis Restaurant May 1, 2014
150	(d)	Spreadsheet summary of payments to C. Clough
151	(d)	Checks to C. Clough
152	(d)	Spreadsheet of all C. Clough Subsys Prescriptions

153	(id)	Table of all C. Clough Subsys Prescriptions, ISPs, and Checks by Month
154	(id)	Chart of Prescriptions and ISPs
155	(id)	Stipulation Regarding Medicare Impact of Subsys prescriptions provided by C. Clough (id) (156) Note from visit with Michael W 12/17
160	(id)	Subsys Dispenser
161	(id)	Box of Subsys Shipment physical physical
200	(id)	Invite for Event at Ristorante Massimo in Portsmouth, NH on November 14, 2013
201	(id)	Email to Clough for event with slides
202	(id)	Sign-In Sheet for N. Levine, C. Clough and S. Toscano
203	(id)	Levine Evaluation Form
204	(id)	Restaurant Receipt
205	(id)	Check No. 801 in amount of \$1,200
206	(id)	Photograph store front Ristorante Massimo
300	(id)	Invite for Event at Brazo in Portsmouth, NH on November 19, 2013
301	(id)	Email to Clough for event with slides
302	(id)	Sign-In Sheet for N. Levine, C. Clough and K. Talon
303	(id)	Levine Evaluation Form
304	(id)	Restaurant Receipt
305	(id)	Check No. 935 in amount of \$2,000
306	(id)	Photograph restaurant Brazo
400	(id)	Invite for Event at Met Back Bay in Boston, MA on January 13, 2014
401	(id)	Email to Clough for event with slides
402	(id)	Sign-In Sheet for N. Levine, C. Clough, L. Clough and P. March
403	(id)	Check No. 1550 in amount of \$1,000
404	(id)	Evaluation Form
405	(id)	Restaurant Receipt
406	(id)	Photograph restaurant Met Back Bay
500	(id)	Invite for Event at the Black Trumpet Wine Bar in Portsmouth, NH February 19, 2014
501	(id)	Email to Clough for event with slides
502	(id)	N. Levine Evaluation Form
503	(id)	Sign-In Sheet for N. Levine
504	(id)	Sign-In Sheet for C. Clough
505	(id)	Sign-In Sheet for L. Clough
506	(id)	Restaurant Receipt
507	(id)	Check No. 2135 in the amount of \$1,500
508	(id)	Photograph restaurant Black Trumpet
600	(id)	Email to Clough for event with slides at Stella in Boston, Ma on March 11, 2014
601	(id)	Sign-In Sheet for N. Levine
602	(id)	Sign-In Sheet for C. Clough
603	(id)	Sign-In Sheet for L. Clough
604	(id)	Restaurant Receipt
605	(id)	Check No. 2408 in the amount of \$2,000
606	(id)	N. Levine Evaluation Form
607	(id)	Photograph restaurant Stella
700	(id)	Invite for Event at Surf in Portsmouth, NH on July 28, 2014

701	(id)	Email to Clough confirming event
702	(id)	Levine Evaluation Form
703	(id)	Sign-In Sheet for N. Levine
704	(id)	Sign-In Sheet for C. Clough
705	(id)	Sign-In Sheet for J. Crane
706	(id)	Sign-In Sheet for T. Cole
707	(id)	Sign-In Sheet for S. McGlone
708	(id)	Restaurant Receipt
709	(id)	Check No. 25662 from Plan365 in the amount of \$1,000
710	(id)	Photograph restaurant Surf
800	(id)	Invite for Event at Jumpin' Jays in Portsmouth, NH on August 18, 2014
801	(id)	Email to C. Clough confirming event
802	(id)	Levine Evaluation
803	(id)	Sign-In Sheet for N. Levine
804	(id)	Sign-In Sheet for C. Clough
805	(id)	Sign-In Sheet for E. Dowdey
806	(id)	Sign-In Sheet for S. Colby
807	(id)	Sign-In Sheet for N. Wheeler
808	(id)	Sign-In Sheet for S. McGlone
809	(id)	Restaurant Receipt
810	(id)	Check No. 26202 from Plan 365 in the amount of \$1,000
811	(id)	Photograph restaurant Jumpin Jay's
900	(id)	Email confirmation to Surf Restaurant in Portsmouth, NH on August 5, 2014
901	(id)	Email with sign-in sheets
902	(id)	Restaurant Receipt

903 (id) Letter dated Aug 13<sup>th</sup> 2015 to Investigator Brown.

The United States asks for leave to amend its exhibit list as may become appropriate and necessary during the proceeding.

Dated: December 12, 2018

Respectfully submitted,

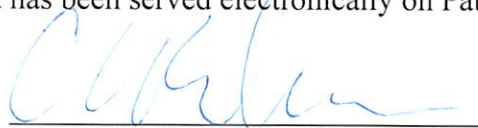
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**CERTIFICATION**

I hereby certify that a copy of this document has been served electronically on Pat Richard, Esq., counsel for defendant.



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Charles L. Rombeau  
Assistant United States Attorney